

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EMMANUEL CORNET, JUSTINE DE
CAIRES, GRAE KINDEL, ALEXIS
CAMACHO, JESSICA PAN, EMILY
KIM, MIGUEL BARRETO, and BRETT
MENZIES FOLKINS, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

TWITTER, INC.

Defendant.

C.A. No. 1:23-cv-00441-TMH

**NOTICE OF SETTLEMENT AND STIPULATION AND [PROPOSED]
ORDER STAYING CASE**

WHEREAS, Plaintiffs Emily Kim, Miguel Barreto, and Brett Menzies Folkins (“Plaintiffs”) and Defendant X Corp., on its own behalf and as successor in interest to Defendant Twitter, Inc. (hereinafter “Defendant”) (Plaintiffs and Defendant collectively as the “Parties”), by and through their undersigned counsel, hereby notify the Court that on August 21, 2025, the Parties reached a settlement in principle of this matter;

. WHEREAS, the Parties are in the process of drafting a written agreement addressing the specific settlement terms but expect it may take a few weeks to

finalize and execute;

WHEREAS, the Parties anticipate filing a stipulated dismissal under Rule 41 within the next thirty (30) days;

WHEREAS, the Parties have conferred and agree that staying this case, including all deadlines and pending motions, while they finalize the written settlement agreement will promote efficiency, avoid duplicative efforts, and appropriately conserve resources of the parties and the Court;

IT IS HEREBY STIPULATED AND AGREED, by the parties herein, through their undersigned counsel, subject to the approval of the Court, that:

1. This case, including all deadlines and pending motions, shall be stayed until a written settlement agreement is executed and a stipulation of dismissal is filed, or until otherwise ordered by this Court;
2. The Parties will provide a joint status update to this Court within forty-five (45) days if a stipulation of dismissal has not been filed; and
3. During the pendency of the stay, all parties will reserve all rights, including regarding any pending motions.

Dated: August 28, 2025

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IT IS SO ORDERED this _____ day of _____, 2025.

The Honorable Todd M. Hughes